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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 07 CR 755
)	
v.)	
)	Judge Robert W. Gettleman
JAROSLAVA KLEPLOVA and)	
KRZYSZTOF RADZEWICZ)	

AGREED PROTECTIVE ORDER RELATING TO DISCOVERY

Upon the government's agreed motion for a protective order, it is hereby ORDERED as follows:

1. All materials produced which are identified as potential or actual exhibits for trial by the United States, shall remain the property of the United States. Upon conclusion of the trial and any appeals of this case or upon the earlier resolution of charges against the defendant, all such materials and all copies made thereof shall be returned to the United States or destroyed, unless otherwise ordered by the Court. All copies withheld by the defense by express order of this Court shall be preserved only so long as is necessary for further proceedings related to this case, after which they shall be returned to the United States or destroyed. The Court may require a certification as to the disposition of any such materials.

2. All materials produced which are identified as potential or actual exhibits for trial by the United States may be utilized by the defendants and his or her counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceedings. These materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than the defendant, defendant's counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any notes or records of any kind that

defense counsel or the defendant may make in relation to the contents of such materials shall not be disclosed to anyone other than the defendant, defendant's counsel, and persons employed to assist the defense, or such other persons as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The materials produced which are identified as potential or actual exhibits for trial by the United States shall not be copied or reproduced except so as to provide copies of such materials for the use by each defense lawyer and defendant and such persons as are employed to assist in the defense, and such copies and reproductions shall be treated in the same manner as the original matter.

4. The restrictions set forth in this order do not apply to documents that are not identified as potential or actual trial exhibits by the United States or that are public record.

ENTER:



Hon. Robert W. Gettleman

Date: 9/8/09